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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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**UNITED STATES OF AMERICA : CRIMINAL COMPLAINT**

**v. : Magistrate No. 19-7040**

**VAUGHN TIEDEMAN :**

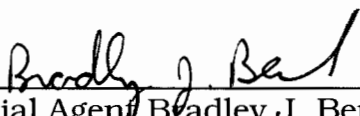
I, Bradley J. Benwell, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

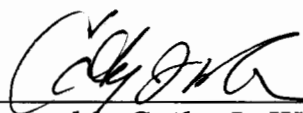
SEE ATTACHMENT B

continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Special Agent Bradley J. Benwell  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me and subscribed in my presence,

April 1, 2019 at Newark, New Jersey  
Date City and State

  
\_\_\_\_\_  
Honorable Cathy L. Waldor  
United States Magistrate Judge

**ATTACHMENT A**

**Count 1**  
**(Distribution of Child Pornography)**

From on or about July 31, 2018 through on or about January 17, 2019, in Passaic County, in the District of New Jersey, and elsewhere, defendant

VAUGHN TIEDEMAN

did knowingly distribute material containing child pornography, as defined in 18 U.S.C. § 2256(8), using any means and facility of interstate and foreign commerce and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and Section 2.

## **ATTACHMENT B**

I, Bradley J. Benwell, am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

### **Background**

1. At all times relevant to this Complaint, defendant Vaughn Tiedeman ("Tiedeman") was a resident of West Milford, Passaic County, New Jersey.

### **The Investigation**

2. The "BitTorrent Network" is a publicly available online peer-to-peer ("P2P") file-sharing network, that is, a worldwide network of linked computers. To access the BitTorrent Network, a user must first download P2P software (the "Software"), which is widely available for free on the Internet. The Software allows the user to (1) place files into a designated "shared" folder on his or her hard drive, from which other BitTorrent users can then download those files directly to the "shared" folders of their own computers; and (2) browse, search, select, and directly download, into his or her "shared" folder, files from the "shared" folders of other BitTorrent users. The Software typically keeps a log of each download event, and forensic examiners can often determine, using such logs, from which Internet Protocol ("IP") address— that is, from which unique computer or device – a user obtained a particular file.

3. From on or about July 31, 2018, through on or about January 17, 2019, law enforcement used special software to access the BitTorrent Network and downloaded more than 50 video files and 100 image files containing child pornography from a certain IP address (the "Target IP Address") controlled by Optimum Online.

4. I have reviewed the multiple files that law enforcement downloaded from the Target IP Address via the BitTorrent Network from on or about July 31, 2018 through on or about January 17, 2019. The following is a representative sample of the files that I reviewed:

| FILENAME  | DESCRIPTION   |
|---|---|
| <p>File Name/Number:<br/>Kiddy-XXX-Incest-5yo raped, hymen penetrated – kiddy little girl young porn real sex baby pedo (no sound).mpg.</p> <p>Hash Value:<br/>Not captured</p> <p>Downloaded by law enforcement:<br/>July 31, 2018, 1:33 a.m. – 2:21 a.m.</p>    | <p>This approximately 41-second video, located in a folder titled “New Folder,” was downloaded by law enforcement depicts the pelvic region of a prepubescent girl who appears to be between 5 and 7 years of age, lying on a white sheet with her legs spread wide apart. At the lower edge of the screen, an erect adult male penis is visible. The adult male guides his penis first with his right hand and then with his left hand as he vaginally penetrates the prepubescent girl.</p>   |
| <p>File Name/Number:<br/>5YO girl drulling with cum from big blow job mafia sex Pedo Pedofilia Kids Child Porn 186.mpg</p> <p>Hash Value:<br/>b74e2119abeff7d00263abf890eceb09</p> <p>Downloaded by law enforcement:<br/>July 31, 2018, 1:33 a.m. – 2:21 a.m.</p> | <p>This image, located in a subfolder labeled “NEW FOLDER,” depicts a prepubescent girl with straight medium-dark brown hair and brown eyes who appears to be between 5 and 7 years of age and is wearing a pink and yellow shirt or bathing suit. She is looking at the camera with her arms held straight down to prop her up. Her legs are spread apart behind her in a triangle holding her rear end up above the ground. An erect adult penis is visible in the foreground which is pointed straight up and has just ejaculated. Only the erect penis, upper thighs and crotch area of the adult male are visible. Semen is dripping from the girls’ mouth onto the erect penis.</p> |
| <p>File Name/Number<br/>Gracel Series Melissa Set 4-Part 03 (Hmm).rar</p> <p>Hash Value:<br/>5dd359da85ac1ae25bc37a54ef3fe66f</p> <p>Downloaded by law enforcement:<br/>October 31, 2018, 9:54 p.m.</p>   | <p>This video, which was partially downloaded and would run approximately 1 minute and 35 seconds in length if fully downloaded, depicts a prepubescent Asian girl with long black hair who appears to be approximately 7 to 9 years in age. She is wearing only a red shirt, which has been pulled just below her undeveloped breasts, and silver high</p>   |



| FILENAME   | DESCRIPTION   |
|--|---|
|  | <p>heeled shoes. She is positioned on all fours on a bed on a white wooden box frame with white sheets and a medium brown headboard framed in white wood. A bare white wall and a white door are visible in the background. An adult male is standing in profile at the foot of the bed on the right side of the screen behind the girl. He is visible only from the upper stomach and below and is wearing only a medium blue tee shirt. The adult male is penetrating the prepubescent girl with his penis from behind throughout the video. A second segment depicts this girl in the same position, but the girl is facing the camera as the adult male penetrates her from behind. A digital camera is lying upon the bed to the left of the girl, and it appears that a remote control device is visible in the adult male's left hand.</p> |
| <p>File Name/Number:<br/>Dad come in 5yo tight pussy.avi</p> <p>Hash Value:<br/>194ef43b9cfa5ccd3660f94e228f08b4</p> <p>Downloaded by law enforcement:<br/>January 17, 2019, 4:47 p.m.</p> | <p>This video, which was partially downloaded and would run approximately 1 minute and 17 seconds in length if fully downloaded, depicts a close-up of an adult male engaged in sexual intercourse with a prepubescent female. The female, who is lying on her back on white sheets with floral designs, is visible from her waist to her vaginal area. The video begins with the adult male rubbing his erect penis against the prepubescent female's vagina. Approximately 12 seconds into the video, the male holds his penis with his left hand and partially inserts it into the prepubescent female's vagina while also rubbing his own penis with his hand. Approximately 23 seconds into</p>  |

| FILENAME | DESCRIPTION   |
|----------|---|
|          | the video, the adult male ejaculates into the vaginal area of the prepubescent female. He continues to rub his penis against her vagina for the remainder of the video. |

5. Based upon my education, training, and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the files described in paragraph 4 above traveled in interstate commerce, via the Internet.

6. On or about November 1, 2018, in response to a subpoena, Optimum Online provided law enforcement with subscriber information indicating that the Target IP Address was assigned to an Optimum Online subscriber account subscribed to by Tiedeman at 121 Poplar Grove Terrace, West Milford, New Jersey (the "Residence") from on or about July 19, 2018 through at least on or about December 21, 2018. Optimum Online subsequently provided law enforcement with additional records confirming that the Target IP Address remained subscribed to Tiedeman at the Residence as of February 15, 2019.

7. On or about March 15, 2019, law enforcement conducted a query of the New Jersey Motor Vehicle Services database, which revealed that Tiedeman holds a New Jersey operator's license and that a Mazda Miata with New Jersey license plate MARIOKT is registered in his name. The Residence is Tiedeman's address of record with New Jersey Motor Vehicle Services.

8. On or about March 15, 2019, law enforcement observed a Mazda Miata with New Jersey license plate MARIOKT parked in the driveway of the Residence.

9. On or about March 20, 2019, law enforcement confirmed with the United States Postal Service that Tiedeman receives mail at the Residence, which is a single-family home.

10. Investigation to date has revealed that Tiedeman is the owner of record of the Residence.

11. On or about April 1, 2019, law enforcement executed a lawfully obtained search warrant at the Residence, where law enforcement discovered and seized, among other things, computer equipment belonging to Tiedeman.

A preliminary examination of that equipment revealed that at least one of Tiedeman's computers contains images and videos containing child pornography.